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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL**

Courtroom: F-15th Floor
Magistrate Judge: Hon. Jacqueline Scott Corley
Trial: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of James Lin
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal its Motion to Compel (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Letter Brief re Motion to Compel	Highlighted Portions
Exhibit 1 to Boock Declaration – Email from Todd Boock dated August 31, 2017, 10:40 A.M.	Highlighted Portions
Exhibit 2 to Boock Declaration – Email from Todd Boock dated August 31, 2017, 1:09 P.M.	Highlighted Portions
Exhibit 7 to Jennings Declaration – Document Bates-stamped WAYMO-UBER-00084602 – 00084608	Entire Document
Exhibit 9 to Jennings Declaration – Document Bates-stamped WAYMO-UBER-00006391 – 00006392	Entire Document
Exhibit 10 to Jennings Declaration – Excerpts of Deposition Transcript of Pierre-Yves Droz dated August 22, 2017	Entire Document

The highlighted portions of the Letter Brief, the highlighted portions of Exhibits 1 and 2 to the Boock Declaration, and the entirety of Exhibits 7, 9, and 10 to the Jennings Declaration contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking's request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing.

Dated: August 31, 2017

Respectfully submitted,

By: /s/ James Lin

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 31, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 31, 2017**.

/s/ James Lin
JAMES LIN